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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA, SOUTHERN DIVISION
9

10 HOLLYE BRYANT, individually,
11 Plaintiff,
12 vs.

CASE NO. 2:18-cv-00996-GMN-VCF

**STIPULATION TO EXTEND
DISCOVERY (Second Request)**

13 ALBERTSON'S, LLC, and ABS NV-O, LLC
and SIMMONS CENTRE, LLC and DOES 1
14 through 100, and ROE CORPORATIONS,
101 through 200,
15 Defendants.
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17 Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1, Defendant Simmons Centre, LLC,
18 Plaintiff Hollye Bryant, and Defendants Albertson's, LLC and ABS NV-O, LLC (collectively "the
19 Parties"), by and through their respective attorneys, hereby stipulate to extend discovery deadlines
20 and other deadlines set forth in the November 15, 2018 Scheduling Order (Document #23). These
21 extensions are made necessary by the pendency of Defendant Albertson's Motion for Summary
22 Judgment (Document # 12) and Plaintiff's Motion to Remand (Document # 24). The requested
23 extensions are as follows:

24 1. **Initial Disclosures**

25 Closed

26 2. **Completed Discovery**

27 Written discovery has been exchanged by the original parties. Plaintiff's deposition was
28 taken on September 4, 2018. Plaintiff served written discovery on Defendant Simmons Centre on

1 March 18, 2019.

2 **3. Remaining Discovery**

3 The parties plan to conduct remaining depositions and to retain experts, if warranted.

4 **4. Current Discovery Deadlines**

5 Discovery Cut-off: June 11, 2019

6 Amended Pleadings/Adding Parties: Closed

7 Initial Expert Disclosures: April 12, 2019

8 Rebuttal Expert Disclosures: May 13, 2019

9 Interim Status Report: April 12, 2019

10 Dispositive Motion deadline: July 11, 2019

11 Joint Proposed Pretrial Order: August 12, 2019

12 **5. Proposed Extended Discovery Deadlines**

13 Whereas, no prejudice will occur to this Court or the Parties if granted, good cause
14 supports this request to extend discovery;

15 In consideration of the foregoing, and for good cause, it is stipulated by and among the
16 parties as follows:

17 The **November 15, 2018 Scheduling Order** shall be amended as follows:

18 Discovery Cut-off: August 9, 2019

19 Amending Pleadings/Adding Parties: Closed

20 Initial Expert Disclosures: June 10, 2019

21 Interim Status Report: June 10, 2019

22 Rebuttal Expert Disclosures: July 10, 2019

23 Dispositive Motion deadline: September 10, 2019

24 Joint Proposed Pretrial Order: October 10, 2019

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28 ///

1 Dated this 19th day of March 2019

2 BERNSTEIN & POISSON

3 BY /s/ Jamie H. Corcoran

4 Jamie H. Corcoran, Esq.
5 Nevada Bar No. 11790
6 320 South Jones Blvd.
7 Las Vegas, NV 89107
8 *Attorneys for Plaintiffs*

Dated this 19th day of March 2019

LEWIS BRISBOIS BISGAARD & SMITH LLP

BY /s/ Jason G. Revzin

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9 Dated this 19th day of March 2019

10 BACKUS CARRANZA & BURDEN

11 BY /s/ Jack P. Burden

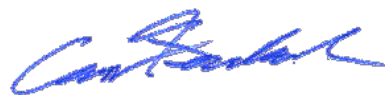
12 Jack P. Burden
13 Nevada Bar No. 6918
14 3050 S. Durango Drive
15 Las Vegas, NV 89117
16 *Attorneys for Albertson's, LLC and*
17 *ABS NV-O*

18 **ORDER**

19 **IT IS SO ORDERED:**

20 **DATED:** 3-20-2019

21 _____



22 _____
23 **UNITED STATES MAGISTRATE JUDGE**